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15 *Attorneys for Plaintiff and Counter-defendant Epic Games, Inc.*

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **OAKLAND DIVISION**

19 EPIC GAMES, INC.,
20 Plaintiff, Counter-defendant,
21 v.
22 APPLE INC.,
23 Defendant, Counterclaimant.
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No. 4:20-CV-05640-YGR-TSH

**DECLARATION OF JOSEPH
KREINER IN SUPPORT OF EPIC'S
SUPPLEMENTAL ADMINISTRATIVE
MOTION TO SEAL LIMITED
PORTIONS OF DX-3993 AND DX-4219**

The Honorable Yvonne Gonzalez Rogers

1 I, Joseph Kreiner, declare as follows:

2 1. I am Vice President of Business Development at Epic Games, Inc. ("Epic"). I
3 joined Epic in 2011. I make this declaration on my own personal knowledge and, if called as a
4 witness, I could and would testify competently to the matters set forth herein.

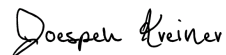
5 2. In my role, I am responsible for managing Epic's relationships with third parties,
6 such as content developers and platforms.

7 3. I have reviewed DX-3993 and determined that the unsealed portions of this exhibit
8 that are the subject of Epic's motion contain sensitive third-party confidential business
9 information entrusted to and shared with Epic by its partners. Our agreements with those partners
10 require Epic to treat such third-party information as confidential; Epic takes those responsibilities
11 seriously and protects this information as it would its own confidential business information. The
12 third-party information at issue has not been disclosed publicly.

13 4. If revealed, this information would negatively impact those third parties'
14 competitive standing. Specifically, the unsealed portions of DX-3993 that are the subject of
15 Epic's motion contain third-parties' non-public business and revenue information.

16 5. I have reviewed DX-4219 and determined that it contains login information to
17 internal Epic websites. Disclosure of the login information would expose Epic's naming
18 conventions for its internal webpages, which bad actors could use for phishing and other social
19 engineering attempts designed to extract sensitive and confidential information from Epic
20 employees. Epic keeps the login information to internal Epic websites confidential and takes a
21 number of security measures to protect its sensitive and confidential information.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
2 and correct and that I executed this declaration on August 26, 2021, in Cary, North Carolina.

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6 Joseph Kreiner
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FILER'S ATTESTATION

I, Justin C. Clarke, am the ECF User whose ID and password are being used to file this Declaration of Joseph Kreiner in Support of Epic's Supplemental Administrative Motion to Seal Limits Portions of DX-3993 and DX-4219. In compliance with Civil Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document has been obtained from the signatory.

By: /s/ Justin C. Clarke

Justin C. Clarke